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Attorneys for Defendant
Naina Enterprises (CNMI), Inc.
dba Alson's Store

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

MODESTA MANGLONA NADAR,

Plaintiff,

vs.

NAINA ENTERPRISES (CNMI), INC. dba
ALSON'S STORE

Defendant.

CIVIL ACTION NO. 07-0024

PRE-DISCOVERY DISCLOSURE
STATEMENT OF DEFENDANT NAINA
ENTERPRISES (CNMI), INC. DBA
ALSON'S STORE

Comes now Defendant Naina Enterprises (CNMI), Inc. dba Alson's Store and pursuant to LR 16.2 CJ (d) and Federal Rules of Civil Procedure 26(a), by and through its attorneys of record, Carlsmith Ball, LLP, and hereby files its Pre-Discovery Disclosure Statement.

A. Individuals likely to have Discoverable Information

Name

Likely Subject of Information

Haresh Daryanani
Caller Box PPP 206
Saipan, MP 96950

Incident of July 7, 2005

Indra Motwani
(680) 488-2662

Incident of July 7, 2005

Modesta Manglona Nadar

Incident of July 7, 2005

Husband of Modesta Manglona Nadar

Incident of July 7, 2005

B. Description of documents and tangible things in the custody and control of Defendant that are relevant to disputed facts alleged with particularity in the pleadings

1. Defendant has in its possession copies of photographs of Alson's Store taken on August 11, 2007.

C. Computation of Damages

No computation of damages has been made by Defendant as of this date.

D. Insurance Agreement

The insurance agreement that may be applicable to the alleged incident of July 7, 2005 will be provided to Plaintiff's counsel prior to the Case Management Conference.

CARLSMITH BALL LLP

DATED: Saipan, MP, September 28, 2007.

/s/ Sean Frink
JOHN D. OSBORN
SEAN FRINK
Attorneys for Defendant
Naina Enterprises (CNMI), Inc.
dba Alson's Store